

United States of America
In the District Court for the Eastern District of Michigan
Southern Division

AFT Michigan,
Plaintiff,

Hon. Linda V. Parker, District Judge
Hon. Elizabeth A. Stafford

v

Case No.: 17-cv-13292

Project Veritas, a foreign corporation,
and Marisa L. Jorge, a/k/a Marissa Jorge,
a/k/a Marissa Perez,
Defendants.

MARK H. COUSENS
Attorney for the Plaintiff
26261 Evergreen Road, Suite 130
Southfield, Michigan 48076
cousens@cousenslaw.com
248-355-2150
P12273

PAUL M. MERSINO
BUTZEL LONG
150 W Jefferson, Suite 100
Detroit, Michigan 48226
mersino@buztel.com
313-225-7000
P72179

Plaintiff's Notice of Disclosure of Expert Witness

Plaintiff will call as an expert Kevin Smith:

Senior Digital Evidence Consultant
888 Emerald Drive
Windsor, CO 80550
Phone: 410-805-3541

The witness will testify regarding his forensic review of electronic devices owned by and electronic storage maintained by Plaintiff and the extent to which Defendant Jorge viewed or copied the contents of those devices and the files maintained on them.

MARK H. COUSENS
ATTORNEY

26261 EVERGREEN ROAD
SUITE 130
SOUTHFIELD, MICHIGAN 48076
PHONE (248) 355-2150
FAX (248) 355-2170



Plaintiff will call as an expert Nitin Paranjpe:

Thomson Econometrics and Employment Research
2350 Franklin Road, Suite 200
Bloomfield Hills, Michigan 48302
Phone: 248-292-0208
Fax: 248-292-0211

The witness will testify to the damages caused by the infiltration and unlawful conduct of Marissa Jorge.

/s/ Mark H. Cousens

Attorney for Plaintiff

26261 Evergreen Road, Suite 110
Southfield, Michigan 48076
cousens@cousenslaw.com
248-355-2150
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May 30, 2019

Certificate of Service

I hereby certify that on May 30, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:
Paul M. Mersino.

/s/ Mark H. Cousens

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May 30, 2019

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KEVIN M. SMITH
Senior Forensic Examiner
888 Emerald Drive
Windsor, CO 80550
410-805-3541
Kevin.Smith@Atlanticdf.com
<http://www.linkedin.com/in/smithkevinm/>

EXPERT WITNESS APPOINTMENTS

U.S. v. McGee	October 2018 <i>Camp Humphreys, S. Korea</i>
U.S. v. Padgett	June 2018 <i>Caserma Ederle, Italy</i>
U.S. v. Reeves	June 2018 <i>Fort Hood, TX</i>
AFT Michigan v. Project Veritas, et al	October 2017 <i>Flint, MI</i>
State of Maryland v. Zeleny	October 2016 <i>Talbot County, MD</i>
U.S. v. Ross	September 2016 <i>Fort Bragg, NC</i>
U.S. v. Thompson	March 2016 <i>Ramstein AB, Germany</i>
U.S. v. Nelson	September 2014 <i>Fort Stewart, GA</i>
U.S. v. Aguigui	March 2014 <i>Fort Stewart, GA</i>
U.S. v. Alexander	September 2013 <i>Fort Bragg, NC</i>
U.S. v. Rowe	May 2013 <i>Fort Bragg, NC</i>

PROFESSIONAL CERTIFICATIONS

AccessData Certified Examiner <i>AccessData</i>	July 2016 <i>Elkridge, MD</i>
Certified Ethical Hacker <i>EC-Council</i>	March 2015 <i>Linthicum, MD</i>

Lantern Certified Examiner
Katana Forensics, Inc.

August 2013
Middletown, DE

Secure View 3 Mobile Forensics Certification
Susteen, Inc.

March 2012
Fort Bragg, NC

Certificate of Recognition, Digital Forensic Examiner
Department of Defense Cyber Investigations Training Academy

September 2011
Linthicum, MD

Certificate of Recognition, Digital Media Collector
Department of Defense Cyber Investigations Training Academy

August 2011
Linthicum, MD

WORK EXPERIENCE

SENIOR FORENSIC EXAMINER
Atlantic Data Forensics
Elkridge, MD 21075

June 2016 – Present

- Assists civil and criminal investigations by providing digital forensic analysis, delivering written and oral expert testimony.
- Consults with clients on the technical details and practical implications of digital evidence.
- Prepares well written investigative reports, with responsibility for presenting necessary aspects of investigation in sufficient detail and with the highest degree of accuracy to aid in supporting Counsel and/or administrative or civil action.

ADJUNCT FACULTY
Utica College
Utica, NY 13502

January 2016 – Present

- Assists in the evaluation, design and implementation of curriculum, testing and teaching methodologies.
- Makes administrative and procedural decisions and judgements on sensitive student issues.
- Applies relevant and current education methodologies and techniques to enhance learning experience.
- Courses:
 - CYB659 – Advanced Topics in Computer Forensics
 - CYB653 – Network Forensics
 - CRJ355 – Cybercrime Investigations and Forensics

DIGITAL FORENSIC EXAMINER
General Dynamics Advanced Information Systems
Linthicum, MD 21090

August 2014 – June 2016

- Assigned to the Defense Computer Forensic Laboratory (DCFL) and responsible for providing digital forensic support for counter-intelligence and major crimes investigations.
- Completed forensic examinations of physical and logical evidence in an American Society of Crime Laboratory Directors (ASCLD) accredited computer forensic laboratory.
- Prepared well written investigative reports, with responsibility for presenting necessary aspects of investigation in sufficient detail and with the highest degree of accuracy to aid in supporting prosecution and/or administrative or civil action.

SENIOR CONSULTANT
Booz | Allen | Hamilton
Annapolis Junction, MD 20701

December 2013 – August 2014

- Assigned to government agency (non-disclosable) and responsible for providing digital forensic support for cyber counter-intelligence investigations.
- Completed multiple forensic examinations of physical and logical evidence including hard disk drives, cellular phones and other digital storage media utilizing industry standard tools including EnCase, FTK, Internet Evidence Finder (IEF) and Cellebrite.
- Developed strategies and provided experience-based training to improve the efficiency and consistency of service delivery.
- Prepared and conducted client training on XRY, EnCase v7, IEF, and Lantern 3.
- Conducted limited malware analysis utilizing virtual machines and Sandboxie.
- Prepared well written investigative reports, with responsibility for presenting necessary aspects of investigation in sufficient detail and with the highest degree of accuracy to aid in supporting prosecution and/or administrative or civil action.

DIGITAL FORENSIC EXAMINER
10th Military Police Battalion (CID), 3d Military Police Group
Fort Bragg, NC 28310

September 2011 – December 2013

- Assigned to the 10th Military Police Battalion (CID) and responsible for providing digital forensic support to 5 CID field offices as well as assisting other federal and local law enforcement agencies with digital forensic support to include the Federal Bureau of Investigation and United States Secret Service.
- Completed 300+ examinations, consisting of over 35,000 gigabytes of data including search and seizure of physical and logical evidence, imaging of hard disk drives and other digital storage media, recovery of deleted files and folders, internet history, deleted emails, identification of attached devices, analysis of event logs while maintaining a strong focus on case logs, repeatability and chain of custody.
- Developed strategies and standard operating procedures to improve the efficiency and consistency of service delivery and maintained an awareness of industry standards and advancements in order to add value to existing technologies and processes used within the team.
- Prepared and conducted Cellebrite Universal Forensic Extraction Device (UFED) training, certifying over 100 Special Agents to use the UFED as well as the identification, preservation, and proper collection of digital evidence.
- Assisted agents in various aspects of criminal investigations including interviewing complainants, witnesses and subject interrogations, preparing affidavits, serving, and executing search warrant operations for the purpose of obtaining evidence, property, and documents relevant to the investigation, processing crime scenes, identifying, preserving, and collection of evidence.
- Prepared well written investigative reports, with responsibility for presenting necessary aspects of investigation in sufficient detail and with the highest degree of accuracy to aid in supporting prosecution and/or administrative or civil action including Expert courtroom testimony.

CID SPECIAL AGENT
Fort Bragg Field Office (CID)
Fort Bragg, NC 28310

August 2010 – September 2011

- Assigned to the Fort Bragg (CID) General Crimes Investigations Team; Conducted felony-level criminal investigations under the supervision of a senior CID special agent.
- Planned and conducted significant and complex investigations involving violations of Title 18 U.S. Code and UCMJ, to include but not limited to fraud, rape, murder, false statements, sexual assault, arson, conspiracy, child pornography, and theft of government property.

Atlantic Data Forensics
7310 ESQUIRE CT STE 5B, 2ND FL, ELKRIDGE, MD 21075
Phone (410) 540-9000 | Fax (410) 540-9006 | www.AtlanticDF.com

- Performed a variety of law enforcement activities such as interviewing complainants, witnesses and subject interrogations. Administered the oath for affidavits and served, and executed search warrant operations for the purpose of obtaining evidence, property, and documents relevant to the investigation.
- Processed crime scenes, identified, preserved, collected, and maintained chain of custody of evidence, property, and documents relevant to the investigation.

PROFESSIONAL TRAINING

Python Specialization <i>University of Michigan</i>	May 2017 <i>Ann Arbor, MI</i>
Network Intrusion Techniques <i>Department of Defense Cyber Investigations Training Academy</i>	March 2015 <i>Linthicum, MD</i>
Network Intrusion Basics <i>Department of Defense Cyber Investigations Training Academy</i>	February 2015 <i>Linthicum, MD</i>
EnCase CE-E (EnCase v7) <i>Department of Defense Cyber Investigations Training Academy</i>	September 2014 <i>Linthicum, MD</i>
Computer Forensic Examiner- Counterintelligence <i>Department of Defense Computer Forensic Laboratory</i>	July 2014 <i>Linthicum, MD</i>
Managing Computer Crime Units <i>Department of Defense Cyber Investigations Training Academy</i>	November 2013 <i>Linthicum, MD</i>
Advanced Digital Forensic Techniques <i>Federal Law Enforcement Training Center</i>	April 2012 <i>Brunswick, GA</i>
Mobile Device Triage Training <i>Federal Law Enforcement Training Center</i>	April 2012 <i>Brunswick, GA</i>
Windows Forensic Examinations – EnCase <i>Department of Defense Cyber Investigations Training Academy</i>	September 2011 <i>Linthicum, MD</i>
Computer Incident Responder's Course <i>Department of Defense Cyber Investigations Training Academy</i>	August 2011 <i>Linthicum, MD</i>
CID Special Agent Advanced Leaders Course <i>United States Army Noncommissioned Officer Academy</i>	Dec 2010 <i>Fort Leonard Wood, MO</i>
CID Apprentice Special Agent's Course <i>United States Army Military Police School</i>	July 2010 <i>Fort Leonard Wood, MO</i>

PROFESSIONAL PUBLICATIONS/PRESENTATIONS

Overview of Digital Forensics and Considerations <i>Expert Symposium – TCAP/DCAP</i>	March 2019 <i>San Antonio, TX</i>
Various Considerations Regarding Digital Evidence <i>Expert Symposium – TCAP/DCAP</i>	March 2018 <i>San Antonio, TX</i>

Overview of Mobile Forensics and Considerations
Expert Symposium – TCAP/DCAP

March 2017
San Antonio, TX

Cross Examination of the Computer Forensic Expert
Special Victim Prosecutor Conference - TCAP

January 2017
Pepperdine School of Law, CA

Social Media Mining, co-written with Krystina R. Horvath
eForensics Magazine – Social Media

June 2014
Online

CONTINUED ACADEMIC EDUCATION

Master of Science Degree – Digital Forensics and Cyber Investigations
University of Maryland University College

November 2015
Adelphi, MD

Bachelor of Science Degree - Psychology
Troy State University

May 2013
Troy, AL

PROFESSIONAL LICENSES

Maryland Private Detective License – 106-5095
Maryland State Police Licensing Division

July 2017

Colorado Private Investigator – CO PI2.0000457
Colorado Department of Regulatory Agencies

May 2016

CURRICULUM VITAE

NITIN V. PARANJPE, Ph.D.

ADDRESS

Thomson Econometrics and Employment Research
2350 Franklin Road, Suite 200
Bloomfield Hills, Michigan 48302

Phone: (248) 292-0208
Fax: (248)292-0211

EDUCATION

1984 Ph.D. Wayne State University
1980 M.A. Eastern Michigan University
1978 M.A. Poona University (India)
1976 B.A. Poona University (India)

Ph.D. Dissertation: Impact of the Change in the Operating
Structure of the Federal Reserve System on Interest Rates.

Ph.D. Fields: Money & Banking
Econometrics
Computer Science

B.A. Major: Economics
Minor: Applied Statistics

ACADEMIC HONORS

Mendelson Research Grant, WSU, Summer 1983.
Levin Award in Economics, WSU, 1983.
Economics Prize in 1973 and 1976, Poona University.
Graduate Fellowship, WSU, 1980-1981.

ACADEMIC EXPERIENCE

2018 – Present Part-Time Faculty
Eli Broad School of Management
Michigan State University

2015 – Present Part-Time Faculty
Department of Industrial Engineering
College of Engineering
Wayne State University

2012 – Present Sessional Instructor, Quantitative Studies
Master of Management Program
University of Windsor
Ontario, Canada

1998-Present Lecturer, Quantitative Methods
 Department of Economics & Decision Sciences
 Oakland University

2000-2001 Lecturer, Quantitative Methods
 Department of Decision Sciences
 University of Detroit-Mercy

1993-2005 Lecturer
 Dept. of Community Medicine, School of Medicine
 Wayne State University

1990-1998 Associate Member of the Graduate Faculty
2001-Present Department of Finance and Business Economics
 Wayne State University

1984-1997 Lecturer
 Department of Economics
 Wayne State University

1978 Lecturer
 Department of Economics
 Fergusson College, Poona University

PROFESSIONAL EXPERIENCE

1990-Present Partner, Thomson Econometrics and Employment Research II

Thomson Econometrics and Employment Research is a firm that provides economic and statistical research services to its clients. We also provide computer programming and data processing services. Research has been conducted relative to a broad range of economic and statistical issues, ranging from sophisticated analyses of employment policies and practices (generally regarding discrimination claims), to economic calculations and projections of past and future damages. Damage calculations have included earnings and fringe benefits losses, pension and structured settlement evaluations, lost sales and profits, business valuations, education valuations, medical expenses, losses due to physical injury and/or disability, and economic losses in a few other areas. We also provide interested parties with a framework which is useful for evaluating "non-economic" damages, such as pain and suffering, society and companionship, and hedonic damages.

1984-1990 Program Coordinator and Research Associate,
 Michigan Health Care Education & Research Foundation.

OTHER PROFESSIONAL ACTIVITIES

- April, 1998 Faculty (Economics), Institute for Continuing Legal Education.
- April, 2004 Faculty (Statistics), 29th Annual Labor and Employment Law Institute, sponsored by the Institute for Continuing Legal Education, the Michigan Law Schools, and The Michigan State Bar Association and the FMCS.
- Sept. 2006 Referee, Journal of Legal Economics
American Academy of Economic and Financial Experts.

PROFESSIONAL MEMBER

The American Economic Association

REFEREED PUBLICATIONS

1. "Appropriateness of Psychiatric Hospitalization", Strumwasser et al., Medical Care, 1991.
2. "Reliability and Validity of Utilization Review Criteria: Appropriateness Evaluation Protocol, Standardized MedReview Instrument, and Intensity-Severity-Discharge Criteria", Strumwasser et al., Medical Care, 1990.
3. "The Triple Option Choice: Self-Selection Bias in Traditional Coverage, HMOs, and PPOs", Strumwasser et al., Inquiry, Winter 1989.
4. "Efficiency Gains in Utilization Review", Quality Assurance and Utilization Review, 1989.
5. "Focused Utilization Review Strategies", Strumwasser et al., Quality Review Bulletin, 1989.
6. "To Hospitalize or Not to Hospitalize: HMO versus Fee-For-Service", Strumwasser et al., Group Health Association of America, 1988.

NON-REFEREED PUBLICATIONS

1. "Determining Nonacute Hospital Stays", Strumwasser et al., Business and Health, 1987.